

EXHIBIT 2

U.S. Patent No. 11,145,215 – Google LLC

Claim 1

Rafqa Star LLC (“Rafqa Star”) provides evidence of infringement of claim 1 of U.S. Patent No. 11,145,215 (hereinafter “the ’215 patent”) by Google LLC (“Google”). In support thereof, Rafqa Star provides the following claim charts.

“Accused Instrumentalities” as used herein refers to at least the Google Live View feature within the Android operating system, along with associated hardware and/or software, including but not limited to Google’s back-end servers and related computer systems operated by Google that work in conjunction with the Google Live View feature.

These claim charts demonstrate Google’s infringement by comparing each element of the asserted claims to corresponding components, aspects, and/or features of the Accused Instrumentalities. These claim charts are not intended to constitute an expert report on infringement. These claim charts include information provided by way of example, and not by way of limitation.

The analysis set forth below is based only upon information from publicly available resources regarding the Accused Instrumentalities, as Google has not yet provided any non-public information. An analysis of Google’s (or other third parties’) technical documentation and/or software source code may assist in fully identify all infringing features and functionality. Accordingly, Rafqa Star reserves the right to supplement this infringement analysis once such information is made available to Rafqa Star. Furthermore, Rafqa Star reserves the right to revise this infringement analysis, as appropriate, upon issuance of a court order construing any terms recited in the asserted claims.




Rafqa Star provides this evidence of infringement and related analysis without the benefit of claim construction or expert reports or discovery. Rafqa Star reserves the right to supplement, amend or otherwise modify this analysis and/or evidence based on any such claim construction or expert reports or discovery.

Unless otherwise noted, Rafqa Star contends that Google directly infringes the ’215 patent in violation of 35 U.S.C. § 271(a) by selling, offering to sell, making, and/or using, the Accused Instrumentalities. The following exemplary analysis demonstrates that infringement. Google makes, uses, sells, imports, or offers for sale in the United States, or has made, used, sold, or offered for sale in the past, without authority, products, equipment, or services that infringe claim 1 of the ’215 patent, including without limitation, the Accused Instrumentalities.

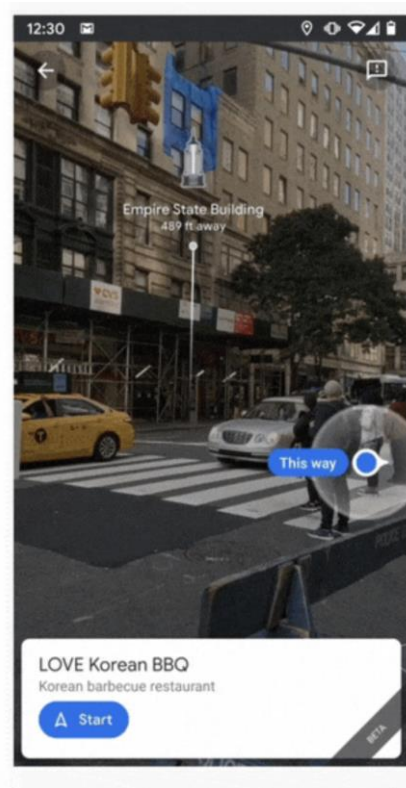
Unless otherwise noted, Rafqa Star believes and contends that each element of the claim asserted herein is literally met through Google’s provision of the Accused Instrumentalities. However, to the extent that Google attempts to allege that any asserted claim element is not literally met, Rafqa Star believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its investigation and analysis of the Accused Instrumentalities, Rafqa Star did not identify any substantial differences between the elements of the patent claim and the corresponding

features of the Accused Instrumentalities, as set forth herein. In each instance, the identified feature of the Accused Instrumentalities performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

To the extent the chart relies on evidence about certain specifically-identified Accused Instrumentalities, Rafqa Star asserts that, on information and belief, any similarly-functioning instrumentalities also infringe the charted claim. Rafqa Star reserves the right to amend this infringement analysis based on other products made, used, sold, imported, or offered for sale by Google. Rafqa Star also reserves the right to amend this infringement analysis by citing other claims of the '215 patent, not listed in the claim chart, that are infringed by the Accused Instrumentalities. Rafqa Star further reserves the right to amend this infringement analysis by adding, subtracting, or otherwise modifying content in the "Accused Instrumentalities" column of the chart.

U.S. Pat. No. 11,145,215 Claim	Accused Instrumentalities
<p>1. A method, comprising:</p> <p>detecting a movement of a portable electronic device in a first direction, that results from a user walking with the portable electronic device in the first direction;</p>	<p>The Accused Instrumentalities perform a method comprising detecting a movement of a portable electronic device in a first direction, that results from a user walking with the portable electronic device in the first direction.</p> <p>For example, as evidenced below, Google Live View, in conjunction with Google Maps and the Android OS, performs a method including detecting a movement of a portable electronic device in a first direction (e.g. while walking towards the Empire State Building), that results from a user walking with the portable electronic device in the first direction.</p> <p>Now, if you're using transit directions and have a <u>walking portion</u> of your journey, you can use Live View to find your way. https://blog.google/products/maps/new-sense-direction-live-view/</p> <p>With Live View, you get directions placed in the real world and on a mini map at the bottom of your screen. You can use Live View navigation during the <u>walking portion</u> of any type of trip.</p> <ol style="list-style-type: none"> 1. On your Android phone or tablet, open the Google Maps app . 2. In the search bar, enter a destination or tap it on the map. 3. Tap Directions . 4. Above the map in the travel mode toolbar, tap Walking . 5. In the bottom center, tap Live View . 6. Follow the on-screen instructions to help Maps find your location. Tip: Point your phone camera at buildings and signs across the street, instead of trees and people. 7. Once Maps knows where you are, you'll get directions through the camera view on your screen. Tip: For safety and to prolong your battery, we suggest you put away your phone once you know where to go.

8. Your phone vibrates when you reach the next navigation step or destination.
9. When you want to return to Live View, simply tilt your phone to a vertical position or press the Live View button.



<https://blog.google/products/maps/new-sense-direction-live-view/>

receiving video data captured in a first direction by a video capture device during the movement,




The Accused Instrumentalities perform a method comprising receiving video data captured in a first direction by a video capture device during the movement, where a first object is in a second direction.

For example, as evidenced below, Google Live View, in conjunction with Google Maps and the Android OS, performs a method including receiving video data captured in a first direction by a video

where a first object is in a second direction; and


capture device during the movement, where a first object (such as the LOVE Korean BBQ) is in a second direction (towards the right hand side).

With Live View, you get directions placed in the real world and on a mini map at the bottom of your screen. You can use Live View navigation during the walking portion of any type of trip.





1. On your Android phone or tablet, open the Google Maps app .
2. In the search bar, enter a destination or tap it on the map.
3. Tap Directions .
4. Above the map in the travel mode toolbar, tap Walking .
5. In the bottom center, tap Live View .
6. Follow the on-screen instructions to help Maps find your location.
Tip: Point your phone camera at buildings and signs across the street, instead of trees and people.
7. Once Maps knows where you are, you'll get directions through the camera view on your screen.
Tip: For safety and to prolong your battery, we suggest you put away your phone once you know where to go.
8. Your phone vibrates when you reach the next navigation step or destination.
9. When you want to return to Live View, simply tilt your phone to a vertical position or press the Live View button.

<https://support.google.com/maps/answer/9332056?hl=en&co=GENIE.Platform%3DAndroid#zippy=%2Cnavigate-with-live-view>

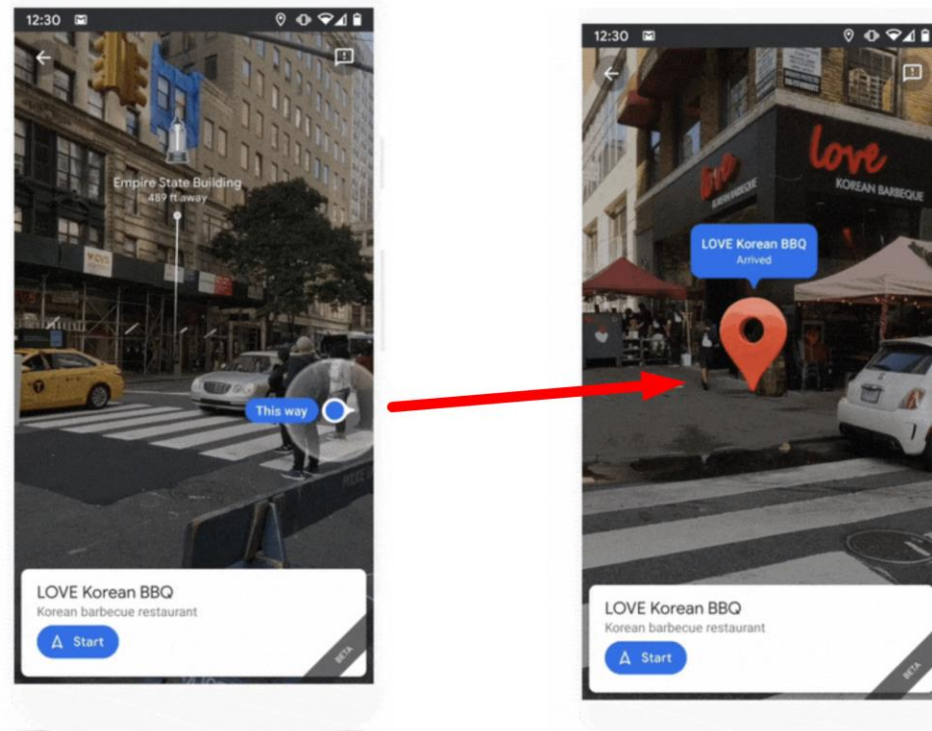
How to know whether Live View works

When you tap Live View , a message pops up on your screen. The message tells you to point your phone camera at buildings, street signs, or any element of scenery that Google Maps can recognize against Street View data in the area. Once Google Maps recognizes where you are, it displays the navigation instructions on your phone.

	<p>https://support.google.com/maps/answer/9332056?hl=en&co=GENIE.Platform%3DAndroid#zippy=%2Cnavigate-with-live-view</p>  <p>https://blog.google/products/maps/new-sense-direction-live-view/</p>
<p>presenting a video by a display device of the portable electronic device that is viewable to the user for directing the user in a</p>	<p>The Accused Instrumentalities perform a method comprising presenting a video by a display device of the portable electronic device that is viewable to the user for directing the user in a second direction towards the first object.</p> <p>For example, as evidenced below, Google Live View, in conjunction with Google Maps and the Android OS, performs a method including presenting a video by a display device of the portable</p>

<p>second direction towards the first object.</p>	<p>electronic device that is viewable to the user for directing the user in a second direction (such as to the right hand side) towards the first object (here, the LOVE Korean BBQ).</p> <p>With Live View, you get directions placed in the real world and on a mini map at the bottom of your screen. You can use Live View navigation during the <u>walking portion</u> of any type of trip.</p> <ol style="list-style-type: none"> 1. On your Android phone or tablet, open the Google Maps app . 2. In the search bar, enter a destination or tap it on the map. 3. Tap Directions . 4. Above the map in the travel mode toolbar, tap Walking . 5. In the bottom center, tap Live View . 6. Follow the on-screen instructions to help Maps find your location. Tip: <u>Point your phone camera at buildings and signs across the street</u>, instead of trees and people. 7. Once Maps knows where you are, <u>you'll get directions through the camera view on your screen</u>. Tip: For safety and to prolong your battery, we suggest you put away your phone once you know where to go. 8. Your phone vibrates when you reach the next navigation step or destination. 9. When you want to return to Live View, simply tilt your phone to a vertical position or press the Live View button. <p>https://support.google.com/maps/answer/9332056?hl=en&co=GENIE.Platform%3DAndroid#zippy=%2Cnavigate-with-live-view</p> <p>How to know whether Live View works</p> <p>When you tap Live View , a message pops up on your screen. The message tells you to <u>point your phone camera at buildings, street signs, or any element of scenery that Google Maps can recognize against Street View data in the area. Once Google Maps recognizes where you are, it displays the navigation instructions on your phone.</u></p>
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